# Statement of Basis of the Federal Operating Permit

Western Refining Terminals, LLC

Site Name: Western Refining El Paso All Sites Area Name: Western Refining Terminals LLC Physical Location: 6501 Trowbridge Dr Nearest City: El Paso County: El Paso

> Permit Number: O3929 Project Type: Initial Issuance

The North American Industry Classification System (NAICS) Code: 324110
NAICS Name: Petroleum Refineries

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). An application for initial permit issuance has been submitted in accordance with 30 TAC § 122.201. This document may include the following information:

A description of the facility/area process description;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected;

A compliance status; and

A list of available unit attribute forms.

Prepared on: March 1, 2019

## Operating Permit Basis of Determination

#### **Permit Area Process Description**

The El Paso Refinery is designed to process crude oils (both sweet and sour) to produce a variety of petroleum products, such as liquefied petroleum gas (LPG), butane, gasoline, diesel, kerosene, jet fuel, fuel oil, and other heavy products such as carbon black oil and asphalt. The refinery has the following main processing areas that are integrated through operations, utilities, and shipping: North Plant; South Plant; Marketing Terminal; and Asphalt Plant. FOP O3929 only authorizes emission units in the transportation, terminals, storage, and the asphalt plant areas of the refinery.

Marketing Terminal -- Wastewater is collected via a network of above and below-ground drains and piping, which drain to the Marketing Terminal sumps. Individual drains in the process areas are controlled using P-traps with water seals. The process unit drains are potential sources of fugitive emissions and are routinely monitored as part of the plant-wide monitoring program in accordance with the Benzene Waste Operations NESHAP (BWON). In accordance with BWON, the sumps vent to the loading rack vapor recover unit.

Asphalt Plant -- Heavy liquid asphalt feed is received from El Paso Refinery processes via pipeline and from other suppliers via railcar where it is stored in tanks. The feed is processed in air stills where the asphaltic residual oils are polymerized by air oxidation to increase the melting temperature and hardness of the asphalt. The exhaust vent from the air stills is disposed of in the asphalt furnace (Furnace F-3601). The furnace is used to maintain the temperature of a heat transfer oil that circulates throughout the plant, warming tank contents and keeping the asphalt conduits from hardening up. Product from the stills is stored in product tanks. Final product is shipped either as a liquid or emulsion in railcars or tank trucks. The fixed roof storage tanks are heated, insulated and vented to a vapor collection system. The vapor collection system is used to reduce the nuisance odor potential in neighboring communities. A similar vent system is in place on the railcar loading racks (TCLR) and tank truck loading racks (TTLR). All vapors are routed to the furnace for destruction. The vapor collection system was installed for purposes of odor control, and not for compliance with any state or federal regulations. The furnace is fired on natural gas. Steam needed for the plant is provided by the El Paso Refinery processes (the plant does not have any means of producing its own steam). Sources of fugitive emissions at the plant are natural gas piping, asphalt process piping, and the vapor collection system.

Wastewater at the plant is routed through an American Petroleum Institute (API) style oil-water separator. Water is received at the separator from knockout drums between the air stills and the furnace, as well as from other sources of process steam condensate. The API separator also receives surface runoff water during storms. From the API separator, wastewater is routed to the EI Paso Refinery processes for final treatment and disposal.

Storage Tanks -- The El Paso Refinery operates fixed roof, floating roof, and pressurized storage tanks for feedstocks, intermediates, final products, and utility services.

Loading and Unloading Rack Units -- The El Paso Refinery operates loading and unloading facilities for the receipt of feedstocks and shipping final products, by-products and waste streams. Loading racks are separated into bulk fuel loading and solid waste loading.

#### **FOPs at Site**

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O1348

### **Major Source Pollutants**

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, SO2, PM, NOX, HAPS, CO

#### **Reading State of Texas's Federal Operating Permit**

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - o Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - New Source Review Authorization Requirements
  - o Compliance Requirements
  - Protection of Stratosphere Ozone
  - o Permit Location
  - Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - o Permit Shield
  - New Source Review Authorization References
  - o Compliance Plan
  - Alternative Requirements
- Appendix A
  - Acronym list

#### General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

#### Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all

units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

#### Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

#### Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

# Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

The applicant opted to comply with the more stringent 20% opacity standard under 30 TAC § 111.111(a)(1)(B) for all stationary vents that are subject to the 30% opacity standard under 30 TAC § 111.111(a)(1)(A).

#### **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes

Regulatory Program	Applicability (Yes/No)
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No
CSAPR (Cross-State Air Pollution Rule)	No
Federal Implementation Plan for Regional Haze (Texas SO <sub>2</sub> Trading Program)	No

#### **Basis for Applying Permit Shields**

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

#### **Insignificant Activities**

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- 5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.
- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.

- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 15. Well cellars.
- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
- 18. Equipment used exclusively for the melting or application of wax.
- 19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
- 20. Shell core and shell mold manufacturing machines.
- 21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
- 22. Equipment used for inspection of metal products.
- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 25. Battery recharging areas.
- 26. Brazing, soldering, or welding equipment.

#### **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at <a href="https://www.tceq.texas.gov/permitting/air/nav/air\_all\_ua\_forms.html">www.tceq.texas.gov/permitting/air/nav/air\_all\_ua\_forms.html</a>.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at <a href="https://www.tceq.texas.gov/permitting/air/nav/air\_supportsys.html">www.tceq.texas.gov/permitting/air/nav/air\_supportsys.html</a>. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an

applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

## Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

## **Determination of Applicable Requirements**

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRPDOME1	30 TAC Chapter 115, Storage of VOCs	R115-T1a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using an internal floating roof (IFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPDOME1	30 TAC Chapter 115, Storage of VOCs	R115-T2a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using an internal floating roof (IFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPDOME1	40 CFR Part 60,	60KB-T1	Product Stored = Volatile organic liquid	
	Subpart Kb	bpart Kb	Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia	
GRPDOME1	40 CFR Part 60,	60KB-T2	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.5 psia but less than 0.75 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
GRPDOME1		60KB-T3	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRPDOME1	40 CFR Part 63, Subpart CC	63CC-T1a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
GRPDOME1	40 CFR Part 63, Subpart CC	63CC-T2a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
GRPDOME1	40 CFR Part 63, Subpart CC	63CC-T3a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
GRPDOME2	30 TAC Chapter 115, Storage of VOCs	R115-T1a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Tank Description = Tank using an internal floating roof (IFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPDOME2	30 TAC Chapter 115, Storage of VOCs	R115-T2a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using an internal floating roof (IFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPDOME2			Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia	
GRPDOME2	,	60KB-T2	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.5 psia but less than 0.75 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
GRPDOME2		60KB-T3	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
GRPDOME2	40 CFR Part 63, Subpart CC	63CC-T1a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
GRPDOME2	40 CFR Part 63, Subpart CC	63CC-T2a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
GRPDOME2	40 CFR Part 63, Subpart CC	63CC-T3a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § $63.640(g)(1)-(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)-(6)$ .	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
GRPEXT1	30 TAC Chapter 115, Storage of VOCs	R115-T1a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Primary Seal = Mechanical shoe	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT1	30 TAC Chapter 115, Storage of VOCs	R115-T1b	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT1	30 TAC Chapter 115, Storage of VOCs	R115-T2a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT1	30 TAC Chapter 115, Storage of VOCs	R115-T2b	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT1	40 CFR Part 63, Subpart CC	63CC-T1	Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.	
GRPEXT1	40 CFR Part 63, Subpart CC	63CC-T2	Existing Source = The storage vessel is at an existing source.  Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).  Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)  Emission Control Type = External floating roof  Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.  Group 1 Storage Vessel = The storage vessel is a Group 1 storage vessel (as defined in 40 CFR § 63.641)  Seal Type = Two seals, one above the other, the primary seal being a metallic shoe seal	
GRPEXT2	30 TAC Chapter 115, Storage of VOCs	R115-T1a2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Tank Description = Tank (other than welded) using an external floating roof (EFR)  Product Stored = VOC other than crude oil or condensate  True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia  Primary Seal = Mechanical shoe  Storage Capacity = Capacity is greater than 40,000 gallons	
GRPEXT2	30 TAC Chapter 115, Storage of VOCs	R115-T1b2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Tank Description = Tank (other than welded) using an external floating roof (EFR)  Product Stored = Crude oil and/or condensate  True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia  Primary Seal = Mechanical shoe  Storage Capacity = Capacity is greater than 40,000 gallons	
GRPEXT2	30 TAC Chapter 115, Storage of VOCs	R115-T2a2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Tank Description = Tank (other than welded) using an external floating roof (EFR)  Product Stored = VOC other than crude oil or condensate	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
GRPEXT2	30 TAC Chapter 115, Storage of VOCs	R115-T2b2	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
GRPEXT2	40 CFR Part 63, Subpart CC	63CC-T1	Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.	
			Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.	
GRPEXT2	40 CFR Part 63,	63CC-T21	Existing Source = The storage vessel is at an existing source.	
	Subpart CC		Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)	
			Emission Control Type = External floating roof	
			Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Group 1 Storage Vessel = The storage vessel is a Group 1 storage vessel (as defined in 40 CFR § 63.641)	
			Seal Type = METALLIC SHOE PRIMARY SEAL AS OF JULY 15, 1994	
GRPEXT3	30 TAC Chapter 115, Storage of VOCs	R115-T1a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = VOC other than crude oil or condensate	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT3	30 TAC Chapter 115, Storage of VOCs	R115-T1b	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT3	30 TAC Chapter 115, Storage of VOCs	R115-T2a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT3	30 TAC Chapter 115, Storage of VOCs	R115-T2b	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT3	40 CFR Part 61, Subpart FF	61FF-T1	Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.	
			Alternative Standard for Tanks = The tank is complying with the alternative standards in 40 CFR § 61.351.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Kb Tank Type = Using an external floating roof that meets the requirements of 40 CFR § 60.112b(a)(2)	
			Seal Type = Mechanical shoe primary seal	
GRPEXT3	40 CFR Part 63, Subpart CC	63CC-T1	Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.	
			Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.	
GRPEXT3	40 CFR Part 63,	63CC-T2	Existing Source = The storage vessel is at an existing source.	
	Subpart CC	bpart CC	Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)	
			Emission Control Type = External floating roof	
			Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Group 1 Storage Vessel = The storage vessel is a Group 1 storage vessel (as defined in 40 CFR § 63.641)	
			Seal Type = Two seals, one above the other, the primary seal being a metallic shoe seal	
GRPEXT4	30 TAC Chapter 115, Storage of VOCs	R115-T1a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT4	30 TAC Chapter 115, Storage of VOCs	R115-T1b	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT4	30 TAC Chapter 115, Storage of VOCs	R115-T2a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT4	30 TAC Chapter 115, Storage of VOCs	R115-T2b	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT4	40 CFR Part 60,	60KB-T1	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia	
GRPEXT4	40 CFR Part 60,	60KB-T2	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.5 psia but less than 0.75 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof with mechanical shoe primary seal	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRPEXT4	40 CFR Part 60,	60KB-T3	Product Stored = Volatile organic liquid	
Subpart Kb	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof with mechanical shoe primary seal	
GRPEXT4	40 CFR Part 63, Subpart CC	63CC-T1a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § $63.640(g)(1)$ -(6) = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
GRPEXT4	40 CFR Part 63,	ppart CC	Product Stored = Crude oil	
	Subpart CC		Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
GRPEXT4	40 CFR Part 63, Subpart CC	63CC-T2a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
GRPEXT4	40 CFR Part 63, Subpart CC	63CC-T2b	Product Stored = Crude oil  Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).  Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.  Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.  Maximum TVP = True vapor pressure is less than 0.75 psia  Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal  Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
GRPEXT4	40 CFR Part 63, Subpart CC	63CC-T3a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition  Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).  Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)  Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.  Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.  Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia  Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
GRPEXT4	40 CFR Part 63, Subpart CC	63CC-T3b	Product Stored = Crude oil  Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).  Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)  Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.  Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.  Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia  Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
GRPEXT6	30 TAC Chapter 115, Storage of VOCs	R115-T1a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT6	30 TAC Chapter 115, Storage of VOCs	R115-T1b	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT6	30 TAC Chapter 115, Storage of VOCs	R115-T2a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
GRPEXT6	30 TAC Chapter 115, Storage of VOCs	R115-T2b	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Storage Capacity = Capacity is greater than 40,000 gallons Secondary Seal = Rim-mounted	
GRPEXT6	40 CFR Part 60, Subpart Kb	60KB-T1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia	
GRPEXT6	40 CFR Part 60, Subpart Kb	60KB-T2	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.5 psia but less than 0.75 psia Storage Vessel Description = Pontoon-type or double-deck-type external floating roof with mechanical shoe primary seal	
GRPEXT6	40 CFR Part 60, Subpart Kb	60KB-T3	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = Pontoon-type or double-deck-type external floating roof with mechanical shoe primary seal	
GRPEXT6	40 CFR Part 63, Subpart CC	63CC-T1a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition  Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).  Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)  Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.  Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.  Maximum TVP = True vapor pressure is less than 0.75 psia  Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
GRPEXT6	40 CFR Part 63, Subpart CC	63CC-T1b	Product Stored = Crude oil  Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).  Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)  Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.  Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
			Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
GRPEXT6	40 CFR Part 63, Subpart CC	63CC-T2a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
GRPEXT6	40 CFR Part 63,	63CC-T2b	Product Stored = Crude oil	
	Subpart CC		Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
			Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
GRPEXT6	40 CFR Part 63, Subpart CC	63CC-T3a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
GRPEXT6	40 CFR Part 63, Subpart CC	63CC-T3b	Product Stored = Crude oil  Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).  Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)  Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.  Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.  Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia  Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a	
			with mechanical shoe primary seal  Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
GRPINT1A	30 TAC Chapter 115, Storage of VOCs	R115-T1a3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Tank Description = Tank using an internal floating roof (IFR)  Product Stored = VOC other than crude oil or condensate  True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia  Storage Capacity = Capacity is greater than 40,000 gallons	
GRPINT1A	30 TAC Chapter 115, Storage of VOCs	R115-T1b3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Tank Description = Tank using an internal floating roof (IFR)  Product Stored = Crude oil and/or condensate  True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia  Storage Capacity = Capacity is greater than 40,000 gallons	
GRPINT1A	30 TAC Chapter 115, Storage of VOCs	R115-T2a3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.  Tank Description = Tank using an internal floating roof (IFR)  Product Stored = VOC other than crude oil or condensate  True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia  Storage Capacity = Capacity is greater than 40,000 gallons	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRPINT1A	30 TAC Chapter 115, Storage of VOCs	R115-T2b3	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using an internal floating roof (IFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Storage Capacity = Capacity is greater than 40,000 gallons	
GRPINT1A	40 CFR Part 63, Subpart CC	63CC-T1	Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.	
			Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.	
GRPINT1A	40 CFR Part 63,	63CC-T22	Existing Source = The storage vessel is at an existing source.	
	Subpart CC		Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)	
			Emission Control Type = Fixed roof and an internal floating roof	
			Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Group 1 Storage Vessel = The storage vessel is a Group 1 storage vessel (as defined in 40 CFR § 63.641)	
			Seal Type = Two seals mounted one above the other so that each forms a continuous closure that completely cover the space between the wall of the storage vessel and the edge of the internal floating roof	
GRPVERT1	40 CFR Part 63, Subpart CC	63CC-T1	Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.	
			Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRPVERT5	30 TAC Chapter 115, Storage of VOCs	R115-T	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Product Stored = Other than crude oil, condensate, or VOC	
GRPVERT5	40 CFR Part 60, Subpart Kb	R5112	Product Stored = Stored product other than volatile organic liquid or petroleum liquid	
T-101	40 CFR Part 60, Subpart Kb	60KB-T1b	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia	
T-101	40 CFR Part 61, Subpart FF	61FF-T2	Waste Treatment Tank = The tank does not manage, treat or store a waste stream subject to 40 CFR Part 61, Subpart FF.	
T-132	40 CFR Part 60, Subpart Kb	60KB-T1b	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia	
T-132	40 CFR Part 60, Subpart Kb	60KB-T2b	Product Stored = Volatile organic liquid  Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)  Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.5  psia but less than 0.75 psia  Storage Vessel Description = Emission controls not required (fixed roof)	
T-132	40 CFR Part 63, Subpart CC	63CC-T1a2	Product Stored = Refined petroleum products  Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).  Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)  Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.  Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.  Maximum TVP = True vapor pressure is less than 0.75 psia  Storage Vessel Description = No floating roof	
T-132	40 CFR Part 63, Subpart CC	63CC-T1b2	Product Stored = Crude oil  Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).  Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)  Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = No floating roof	
			Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
T-132	40 CFR Part 63,	63CC-T2a2	Product Stored = Refined petroleum products	
	Subpart CC		Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = No floating roof	
T-132	40 CFR Part 63,	63CC-T2b2	Product Stored = Crude oil	
	Subpart CC		Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = No floating roof	
			Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
T-139	30 TAC Chapter 115, Storage of VOCs	R115-T1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank does not require emission controls	
			Product Stored = Other than crude oil, condensate, or VOC	
			True Vapor Pressure = True vapor pressure is less than 1.0 psia	
T-139	40 CFR Part 60,	60KB-1	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
T-139	40 CFR Part 63, Subpart CC	63CC-T1	Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.	
			Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.	
T-4035	30 TAC Chapter 115, Storage of VOCs	R115-T1a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
T-4035	30 TAC Chapter 115, Storage of VOCs	R115-T1b	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
T-4035	30 TAC Chapter 115, Storage of VOCs	R115-T2a	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
T-4035	30 TAC Chapter 115, Storage of VOCs	R115-T2b	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank (other than welded) using an external floating roof (EFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Primary Seal = Mechanical shoe	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Secondary Seal = Rim-mounted	
T-4035	40 CFR Part 60,	60KB-T1	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia	
T-4035	40 CFR Part 60,	60KB-T2	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.5 psia but less than 0.75 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof with mechanical shoe primary seal	
T-4035	40 CFR Part 60,	60KB-T3	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof	
			with mechanical shoe primary seal	
T-4035	40 CFR Part 61, Subpart FF	61FF-T1	Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.	
			Alternative Standard for Tanks = The tank is complying with the alternative standards in 40 CFR § 61.351.	
			Kb Tank Type = Using an external floating roof that meets the requirements of 40 CFR § 60.112b(a)(2)	
			Seal Type = Mechanical shoe primary seal	
T-4035	40 CFR Part 63, Subpart CC	63CC-T1a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
T-4035	40 CFR Part 63,	63CC-T1b	Product Stored = Crude oil	
	Subpart CC		Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
			Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
T-4035	40 CFR Part 63, Subpart CC	63CC-T2a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
T-4035	40 CFR Part 63, Subpart CC	63, 63CC-T2b	Product Stored = Crude oil	
			Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
			Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
T-4035	40 CFR Part 63, Subpart CC	63CC-T3a	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
T-4035	40 CFR Part 63,	63CC-T3b	Product Stored = Crude oil	
	Subpart CC		Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = Pontoon-type or double-deck-type external floating roof a with mechanical shoe primary seal	
			Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
T-4042	30 TAC Chapter 115, Storage of VOCs	R115-T1	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank does not require emission controls	
			Product Stored = Other than crude oil, condensate, or VOC	
			True Vapor Pressure = True vapor pressure is less than 1.0 psia	
T-4042	40 CFR Part 60,	60KB-1	Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia	
T-4042	40 CFR Part 63, Subpart CC	63CC-T1	Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.	
			Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.	
T-4064	30 TAC Chapter 115, Storage of VOCs	R115-T1b6	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
			Control Device Type = Carbon adsorber (non-regenerative).	
T-4064	40 CFR Part 60,	Subpart Kb Storage Capacity =	Product Stored = Waste mixture of indeterminate or variable composition	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)	
T-4064	40 CFR Part 61, Subpart FF	61FF-T1	Bypass Line = The closed vent system does not contain any by-pass line that could divert the vent stream away from the control device.	Added the following missing reporting requirements under NESHAP FF (Affected Pollutant – BENZENE):
			Tank Control Requirements = The tank has a fixed roof and closed vent system routing vapors to either a fuel gas system or control device.	§ 61.357(d)(7) § 61.357(d)(7)(iv)
			Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.	§ 61.357(d)(7)(iv)(D)
			Alternative Standard for Tanks = The tank is not complying with the alternative standards in 40 CFR § 61.351.	§ 61.357(d)(7)(iv)(l)
		Fuel Gas System = Gaseous emissions from the tank or enclosure are not routed to a fuel gas system.		
			Closed Vent System and Control Device = A closed vent system and control device is used.	
			Control Device Type/Operations = Carbon adsorption system that does not regenerate the carbon bed directly in the control device	
			Cover and Closed Vent = The cover and closed vent system are not operated such that the tank is maintained at a pressure less than atmospheric pressure and meets the conditions of 40 CFR $\S$ 61.343(a)(1)(i)(C)(1) - (3).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Closed Vent System and Control Device AMOC = Not using an alternate means of compliance	
			Engineering Calculations = Engineering calculations show that the control device is proven to achieve its emission limitation.	
			Alternative Means of Compliance = Not using an alternate means of compliance to meet the requirements of 40 CFR § 61.343 for tanks.	
			Carbon Replacement Interval = The carbon in the carbon adsorption system is replaced when monitoring indicates breakthrough.	
T-4610	30 TAC Chapter 115, Storage of VOCs	R115-T1a4	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using an internal floating roof (IFR)	
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is less than 1.0 psia	
			Storage Capacity = Capacity is greater than 40,000 gallons	
T-4610	30 TAC Chapter 115, Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using an internal floating roof (IFR)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Storage Capacity = Capacity is greater than 40,000 gallons	
T-4610	40 CFR Part 60, Subpart Kb	,	Product Stored = Volatile organic liquid	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia	
T-4610	40 CFR Part 60, Subpart Kb		Product Stored = Volatile organic liquid	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.5 psia but less than 0.75 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
T-4610	40 CFR Part 60,		Product Stored = Volatile organic liquid	
	Subpart Kb		Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)	
			Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
T-4610	40 CFR Part 63, Subpart CC	63CC-T1a1	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
T-4610	40 CFR Part 63,	63CC-T1b1	Product Stored = Crude oil	
	Subpart CC		Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
			Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
T-4610	40 CFR Part 63, Subpart CC	63CC-T2a1	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
T-4610	40 CFR Part 63,	3, 63CC-T2b1	Product Stored = Crude oil	
	Subpart CC		Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is less than 0.75 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
			Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
T-4610	40 CFR Part 63, Subpart CC	63CC-T3a1	Product Stored = Volatile organic liquid other than crude oil, refined petroleum products or waste of variable or indeterminate composition	
			Specified in 40 CFR $\S$ 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR $\S$ 63.640(g)(1) - (6).	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
T-4610	40 CFR Part 63,	63CC-T3b1	Product Stored = Crude oil	
	Subpart CC		Specified in 40 CFR § $63.640(g)(1)$ - $(6)$ = The storage vessel is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,416 liters)	
			Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Existing Kb Source = The storage vessel is part of an existing source and is also subject to the provisions of 40 CFR Part 60, Subpart Kb.	
			Maximum TVP = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia	
			Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal	
			Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 2.0 psia	
T-504	30 TAC Chapter 115, Storage of VOCs	R115-T1a6	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Product Stored = VOC other than crude oil or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons	
			Control Device Type = Carbon adsorption system	
T-504	30 TAC Chapter 115, Storage of VOCs	R115-T1b6	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			Product Stored = Crude oil and/or condensate	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 40,000 gallons	
			Control Device Type = Carbon adsorption system	
T-504	40 CFR Part 60, Subpart Kb		Product Stored = Waste mixture of indeterminate or variable composition	
			Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)	
T-504	40 CFR Part 61, Subpart FF		Bypass Line = The closed vent system does not contain any by-pass line that could divert the vent stream away from the control device.	
			Tank Control Requirements = The tank has a fixed roof and closed vent system routing vapors to either a fuel gas system or control device.	
			Waste Treatment Tank = The tank manages, treats or stores a waste stream subject to 40 CFR Part 61, Subpart FF.	
			Alternative Standard for Tanks = The tank is not complying with the alternative standards in 40 CFR § 61.351.	
			Fuel Gas System = Gaseous emissions from the tank or enclosure are not routed to a fuel gas system.	
			Closed Vent System and Control Device = A closed vent system and control device is used.	
			Control Device Type/Operations = Carbon adsorption system that regenerates the carbon bed directly in the control device and has a continuous recorder to measure exhaust concentration	
			Cover and Closed Vent = The cover and closed vent system are not operated such that the tank is maintained at a pressure less than atmospheric pressure and meets the conditions of 40 CFR § 61.343(a)(1)(i)(C)(1) - (3).	
			Closed Vent System and Control Device AMOC = Not using an alternate means of compliance	
			Engineering Calculations = Engineering calculations show that the control device is proven to achieve its emission limitation.	
			Alternate Monitoring Parameters = Alternate monitoring parameters not requested	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Alternative Means of Compliance = Not using an alternate means of compliance to meet the requirements of 40 CFR § 61.343 for tanks.	
T-504	40 CFR Part 63, Subpart CC	63CC-T24	Closed Vent System = Closed vent system is subject to § 63.172 of Subpart H  Existing Source = The storage vessel is at an existing source.  Product Stored = Waste mixture of indeterminate or variable composition  Specified in 40 CFR § 63.640(g)(1)-(6) = The storage vessel is not part of a process specified in 40 CFR § 63.640(g)(1)-(6).  Storage Capacity = Capacity is less than 19.800 gallons (75,708 liters)  Subject to 40 CFR Part 63 Subparts F, G, H or I = The storage vessel is not subject to 40 CFR Part 63, Subparts F, G, H, or I.  True Vapor Pressure = Maximum true vapor pressure of the total organic HAPs in the liquid is less than 11.11 psi (76.6 kPa)  By-pass Lines = Closed vent system has no by-pass lines.  Emission Control Type = Closed vent system and control device  Existing Kb Source = The storage vessel is not part of an existing source or is not subject to the provisions of 40 CFR Part 60, Subpart Kb.  Control Device Type = Carbon adsorber  Group 1 Storage Vessel = The storage vessel is a Group 2 vessel.  Applicability = The storage vessel is required to comply with 40 CFR Part 63, Subpart CC and is part of a process unit.  Control Device Design = The control device was installed after July 15, 1994 or was not designed to reduce inlet emission of total organic hazardous air pollutants by greater than or equal to 90% but less than 95%.  Design Evaluation Submitted = Results of performance test were submitted to	
GRPASPHL R	30 TAC Chapter 115, Loading and Unloading of VOC	R115-M2	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.  Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.  Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.  Transfer Type = Loading and unloading.  True Vapor Pressure = True vapor pressure less than 0.5 psia.	
GRPLGR	30 TAC Chapter 115, Loading and Unloading of VOC	R115-M1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.  Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.  Product Transferred = Liquefied petroleum gas (LPG)  Transfer Type = Loading and unloading.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRPSPNTL R	30 TAC Chapter 115, Loading and	R115-M3	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	Unloading of VOC		Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.	
			Transfer Type = Loading and unloading.	
			True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.	
			Daily Throughput = Loading less than 20,000 gallons per day.	
LRACK1	30 TAC Chapter 115, Loading and	R115-M4	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	Unloading of VOC		Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.	
			Transfer Type = Loading and unloading.	
			True Vapor Pressure = True vapor pressure less than 0.5 psia.	
LRACK1	30 TAC Chapter 115, Loading and Unloading of VOC		Chapter 115 Control Device Type = Vapor control system with a carbon adsorption system.	
			Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
			Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.	
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.	
			Transfer Type = Loading and unloading.	
			True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.	
			Daily Throughput = Loading greater than or equal to 20,000 gallons per day.	
			Control Options = Vapor control system that maintains a control efficiency of at least 90%.	
LRACK1	40 CFR Part 63, Subpart CC	63CC-M1	Specified in $63.640(g)(1)$ - $(6)$ = The gasoline loading rack or marine vessel loading operation is not part of a process specified in 40 CFR § $63.640(g)(1)$ - $(6)$ .	
			Subject to 40 CFR Part 63, Subparts F, G, H or I = The gasoline loading rack or marine vessel loading operation is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Unit Type = Gasoline loading rack classified under Standard Industrial Classification code 2911.	
		_	Vapor Processing System = Carbon adsorbtion system.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
NLR2	30 TAC Chapter 115, Loading and	ng and	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	Unloading of VOC		Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.	
			Transfer Type = Loading and unloading.	
			True Vapor Pressure = True vapor pressure less than 0.5 psia.	
NLR2	40 CFR Part 63,	63EEEE	Existing Source = Source is an existing source	
	Subpart EEEE		Transfer Operation = Transfer rack both loads and unloads organic liquids	
			Transfer Volume = Ten million gallons or more of organic containing liquids are transferred by the organic loading distribution facility annually.	
			Weight Percent HAP = Liquids transferred contain 98 percent by weight or greater HAP	
NLR6	40 CFR Part 60, Subpart XX	60XX	Construction/Modification Date = On or before December 17, 1980	
NLR6	40 CFR Part 63, Subpart CC	60Kb-	Specified in 63.640(g)(1)-(6) = The gasoline loading rack or marine vessel loading operation is not part of a process specified in 40 CFR § 63.640(g)(1) - (6).	
	·		Subject to 40 CFR Part 63, Subparts F, G, H or I = The gasoline loading rack or marine vessel loading operation is not subject to 40 CFR Part 63, Subparts F, G, H, or I.	
			Unit Type = Gasoline loading rack not classified under Standard Industrial Classification code 2911 or marine vessel loading operation at a petroleum refinery not meeting the applicability criteria of 40 CFR § 63.560.	
SLR1	30 TAC Chapter 115, Loading and	R115-M1	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	Unloading of VOC		Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Product Transferred = Liquefied petroleum gas (LPG)	
			Transfer Type = Loading and unloading.	
SLR1	30 TAC Chapter 115, Loading and	nd	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	Unloading of VOC		Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.	
			Transfer Type = Loading and unloading.	
			True Vapor Pressure = True vapor pressure less than 0.5 psia.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
SLR1	30 TAC Chapter 115, Loading and	R115-M5	Chapter 115 Control Device Type = Control device other than a flare, vapor combustor, catalytic incinerator, direct flame incinerator, chiller, or carbon adsorption system.	
	Unloading of VOC		Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
			Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.	
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.	
			Transfer Type = Loading and unloading.	
			True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.	
			Daily Throughput = Loading greater than or equal to 20,000 gallons per day.	
			Control Options = Vapor balance system.	
F-3601	40 CFR Part 63, Subpart DDDDD	63DDDDD-H1	CONSTRUCTION/RECONSTRUCTION DATE = Construction or reconstruction began on or before June 4, 2010.	
			ANNUAL CAPACITY FACTOR = ANNUAL CAPACITY FACTOR OTHER THAN A FEDERALLY ENFORCEABLE ANNUAL CAPACITY FACTOR.	
			FUEL TYPE = NATURAL GAS	
			HEAT INPUT CAPACITY = RATED HEAT INPUT CAPACITY OF GREATER THAN 10 MMBTU/HR BUT LESS THAN 100 MMBTU/HR	
GRPREFFU	30 TAC Chapter	R115-ALL	Agitators = The fugitive unit contains agitators.	Deleted all instances of Related Standard §
G1		inery	Compressor Seals = The fugitive unit contains compressor seals.	115.352(10) for this unit since this requirement only applies to sources in HGB area and not in El Paso
	& Petrochemicals		Flanges = The fugitive unit contains flanges.	county.
			Open-ended Valves = The fugitive unit contains open-ended valves.	
			Pressure Relief Valves = The fugitive unit contains pressure relief valves.	
			Process Drains = The fugitive unit has process drains.	
			Pump Seals = The fugitive unit contains pump seals.	
			Rupture Disks = The fugitive unit has pressure relief valves equipped with rupture disks.	
			Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10.	
			Valves (other than pressure relief and open-ended) = The fugitive unit contains valves other than pressure relief valves or open-ended valves or lines.	
			Alternate Control Requirement = The TCEQ Executive Director has not approved an alternate method for demonstrating and documenting continuous compliance with an alternate control requirement or exemption criteria for process drains or no alternate has been requested.	
			Instrumentation Systems = The fugitive unit has instrumentation systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components.	
			Sampling Connection Systems = The fugitive unit has sampling connection systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.	
			Weight Percent VOC = Components in the fugitive unit contact process fluids that contain less than 10% VOC by weight and process fluids that contains VOC at 10%, or greater, by weight.	
			50% by Volume = Compressors are not in hydrogen service or are in hydrogen service and the hydrogen content cannot be reasonably expected to always exceed 50% by volume.	
			Complying with § 115.352(1) = Valves are complying with § 115.352(1).	
			Complying WIth § 115.352(1) = Agitators are complying with § 115.352(1).	
			Complying with 30 TAC § 115.352(1) = Process drains are complying with the requirements in 30 TAC § 115.352(1).	
			Reciprocating Compressors Or Positive Displacement Pumps = The fugitive unit has reciprocating compressors or positive displacement pumps used in natural gas/gasoline processing operations.	
			Shaft Seal System = Pump seals are equipped with a shaft seal system that prevents or detects emission of VOC from the seal.	
			TVP 0.002 PSIA or Less = The fugitive unit has components or systems that contact a process fluid containing VOC having a true vapor pressure less than or equal to 0.002 psia at 68 degrees Fahrenheit.	
			Shaft Seal System = Compressors are equipped with a shaft sealing system that prevents or detects emission of VOC from the seal.	
			TVP of Process Fluid VOC <= 0.044 psia at 68° F = Pressure relief valves contact a process fluid with a TVP of less than or equal to 0.044 psia at 68° F.	
			TVP of Process Fluid VOC <= 0.044 PSIA AT 68° F = Process drains contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.	
			TVP of Process Fluid VOC <= 0.044 PSIA AT 68• ° F = Pump seals contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.	
			Complying with 30 TAC § 115.352(1) = Pump seals are complying with the requirements in 30 TAC § 115.352(1).	
			TVP of Process Fluid VOC <= 0.044 PSIA AT 68• ° F = Compressor seals contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.	
			TVP of Process Fluid VOC > 0.044 psia at 68° F = Pressure relief valves contact a process fluid with a TVP > 0.044 psia at 68° F.	
			TVP of Process Fluid VOC > 0.044 PSIA AT 68° F = Open-ended valves contact a process fluid containing VOC having a TVP greater than 0.044 psia at 68 degrees Fahrenheit.	
			Complying with § 115.352(1) = Compressor seals are complying with the requirements in 30 TAC § 115.352(1).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRPREFFU G1	40 CFR Part 60, Subpart GGGa	60GGGa-F1	Construction/Modification Date = Affected facility was constructed, reconstructed or modified after November 7, 2006.	
			Equipment Components = Components are present.	
GRPREFFU	40 CFR Part 63,	63CC-F1	CLOSED VENT (OR VAPOR COLLECTION) SYSTEMS = YES	
G1	Subpart CC		COMPRESSOR IN HYDROGEN SERVICE = NO	
			ENCLOSED COMBUSTION DEVICE = NO	
			EXISTING SOURCE = YES	
			FLARE = NO	
			OPEN-ENDED VALVES OR LINES = YES	
			PRESSURE RELIEF DEVICE IN GAS/VAPOR SERVICE = YES	
			PRESSURE RELIEF DEVICE IN HEAVY LIQUID SERVICE = YES	
			VACUUM SERVICE = YES	
			VALVES IN HEAVY LIQUID SERVICE = YES	
			VAPOR RECOVERY SYSTEM = NO	
			CLOSED VENT (OR VAPOR COLLETION) SYSTEMS EQUIVALENT EMISSION LIMITATION = NO	
			COMPLYING WITH TITLE 40 CFR 60 SUBPART VV = YES	
			COMPRESSOR NOT IN HYDROGEN SERVICE = NO	
			ENCLOSED COMBUSTION DEVICE EQUIVALENT EMISSION LIMITATION = NO	
			EQUIVALENT EMISSION LIMIT = NO	
			FLARE EQUIVALENT EMISSION LIMITATION = NO	
			OPEN-ENDED VALVES OR LINES EQUIVALENT EMISSION LIMITATION = NO	
			PRESSURE RELIEF DEVICE COMPLYING WITH § 60.482-4(A)-(B) = YES	
			PUMP IN LIGHT LIQUID SERVICE = YES	
			VALVES IN HEAVY LIQUID SERVICE EQUIVALENT EMISSION LIMITATION = NO	
			VAPOR RECOVERY SYSTEM EQUIVALENT EMISSION LIMITATION = NO	
			COMPRESSOR EQUIVALENT EMISSION LIMITATION = NO	
			PRESSURE RELIEF DEVICES IN LIGHT LIQUID SERVICE = YES	
			PUMP EQUIVALENT EMISSION LIMITATION = NO	
			CLOSED VENT (OR VAPOR COLLETION) SYSTEMS COMPLYING WITH § 60.482-10 = YES	
			COMPLYING WITH § 60.482-8 = YES	
			ENCLOSED COMBUSTION DEVICE COMPLYING WITH § 60.482-10 = NO	
			EQUIVALENT EMISSION LIMIT = NO	
			FLARE COMPLYING WITH §60.482-10 = NO	
			OPEN-ENDED VALVES OR LINES COMPLYING WITH § 60.482-6 = YES	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			VALVES IN HEAVY LIQUID SERVICE COMPLYING WITH § 60.482-8 = YES	
			VAPOR RECOVERY SYSTEM COMPLYING WITH § 60.482-10 = NO	
			COMPRESSOR COMPLYING WITH § 60.482-3 = NO	
			FLANGES AND OTHER CONNECTORS = YES	
			PUMP COMPLYING WITH § 60.482-2 = YES	
			SAMPLING CONNECTION SYSTEMS = YES	
			VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE = YES	
			COMPLYING WITH §60.482-8 = YES	
			FLANGES AND OTHER CONNECTORS EQUIVALENT EMISSION LIMITATION = NO	
			PUMP IN HEAVY LIQUID SERVICE = YES	
			SAMPLING CONNECTION SYSTEM EQUIVALENT EMISSION LIMITATION = NO	
			VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE EQUIVALENT EMISSION LIMITATION = NO	
			PUMP EQUIVALENT EMISSION LIMITATION = NO	
			FLANGES AND OTHER CONNECTORS COMPLYING WITH § 60.482-8 = YES	
			SAMPLING CONNECTION SYSTEMS COMPLYING WITH § 60.482-5 = YES	
			VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE COMPLYING WITH § 60.482-7	
			= YES PUMP COMPLYING WITH § 60.482-8 = YES	
GRPREFFU	30 TAC Chapter	R115-ALL	Agitators = The fugitive unit does not contain agitators.	Deleted all instances of Related Standard §
G2	115, Pet. Refinery & Petrochemicals		Compressor Seals = The fugitive unit contains compressor seals.	115.352(10) for this unit since this requirement only applies to sources in HGB area and not in El Paso
	& Petrochemicals		Flanges = The fugitive unit contains flanges.	county.
			Open-ended Valves = The fugitive unit contains open-ended valves.	
			Pressure Relief Valves = The fugitive unit contains pressure relief valves.	
			Process Drains = The fugitive unit has process drains.	
			Pump Seals = The fugitive unit contains pump seals.	
			Rupture Disks = The fugitive unit has pressure relief valves equipped with rupture disks.	
			Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10.	
			Valves (other than pressure relief and open-ended) = The fugitive unit contains valves other than pressure relief valves or open-ended valves or lines.	
			Alternate Control Requirement = The TCEQ Executive Director has not approved an alternate method for demonstrating and documenting continuous compliance with an alternate control requirement or exemption criteria for process drains or no alternate has been requested.	
			Instrumentation Systems = The fugitive unit has instrumentation systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components.	
			Sampling Connection Systems = The fugitive unit has sampling connection systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.	
			Weight Percent VOC = Components in the fugitive unit contact process fluids that contain less than 10% VOC by weight and process fluids that contains VOC at 10%, or greater, by weight.	
			50% by Volume = Compressors are not in hydrogen service or are in hydrogen service and the hydrogen content cannot be reasonably expected to always exceed 50% by volume.	
			Complying with § 115.352(1) = Valves are complying with § 115.352(1).	
			Complying with 30 TAC § 115.352(1) = Process drains are complying with the requirements in 30 TAC § 115.352(1).	
			Reciprocating Compressors Or Positive Displacement Pumps = The fugitive unit has reciprocating compressors or positive displacement pumps used in natural gas/gasoline processing operations.	
			Shaft Seal System = Pump seals are equipped with a shaft seal system that prevents or detects emission of VOC from the seal.	
			TVP 0.002 PSIA or Less = The fugitive unit has components or systems that contact a process fluid containing VOC having a true vapor pressure less than or equal to 0.002 psia at 68 degrees Fahrenheit.	
			Shaft Seal System = Compressors are equipped with a shaft sealing system that prevents or detects emission of VOC from the seal.	
			TVP of Process Fluid VOC <= 0.044 psia at 68° F = Pressure relief valves contact a process fluid with a TVP of less than or equal to 0.044 psia at 68° F.	
			TVP of Process Fluid VOC <= 0.044 PSIA AT 68° F = Process drains contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.	
			TVP of Process Fluid VOC <= 0.044 PSIA AT 68• ° F = Pump seals contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.	
			Complying with 30 TAC § 115.352(1) = Pump seals are complying with the requirements in 30 TAC § 115.352(1).	
			TVP of Process Fluid VOC <= 0.044 PSIA AT 68• ° F = Compressor seals contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.	
			TVP of Process Fluid VOC > $0.044$ psia at $68^{\circ}$ F = Pressure relief valves contact a process fluid with a TVP > $0.044$ psia at $68^{\circ}$ F.	
			TVP of Process Fluid VOC > 0.044 PSIA AT 68° F = Open-ended valves contact a process fluid containing VOC having a TVP greater than 0.044 psia at 68 degrees Fahrenheit.	
			Complying with $\S$ 115.352(1) = Compressor seals are complying with the requirements in 30 TAC $\S$ 115.352(1).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRPREFFU G2	FFU 40 CFR Part 60, Subpart GGGa 60GGGa-ALL Construction/Modification Date = Affected facility was conmodified after November 7, 2006.		Construction/Modification Date = Affected facility was constructed, reconstructed or modified after November 7, 2006.	
			Equipment Components = Components are present.	
API3	30 TAC Chapter 115, Water	R5140-02	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.	
	Separation		Exemption = Any single or multiple compartment VOC water separator which separates materials having a true vapor pressure less than 0.5 psia (3.4 kPa) obtained from any equipment.	
GRPSUMP	30 TAC Chapter 115, Water Separation	R5140-01	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910.	
	Separation		Exemption = Water separator does not qualify for exemption.	
			Emission Control Option = Vapor recovery system which satisfies the provisions of 30 TAC § 115.131.	
			Control Device = Carbon adsorption system.	
GRPSUMP	30 TAC Chapter	5, Industrial	Petroleum Refinery = The affected source category is a petroleum refinery.	
	115, Industrial Wastewater		Wastewater Component Type = The component is not a wet weather retention basin, exempted by §115.147(2), not a biotreatment unit.	
			Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used.	
			Roof or Seal Type = The wastewater component does not have a floating roof or internal floating roof.	
			Control Devices = Carbon adsorber.	
			90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142.	
			Monitoring Type = The monitoring requirements of 30 TAC §§ 115.144(3)(A) - (H) are being used.	
			Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.	
GRPASPHL	40 CFR Part 60,	60UU-T2	Blowing Still = The affected facility does not contain a blowing still.	
R	Subpart UU		Plant Type = Asphalt processing plant.	
			Storage Tanks = The affected facility contains one or more storage tanks.	
			Construction/Modification Date = Construction or modification was commenced after November 8, 1980.	
			Material Stored = Non-roofing asphalt.	
			Saturators = The affected facility does not contain saturators.	
			Construction/Modification Date = On or before May 26, 1981.	

<sup>\* -</sup> The "unit attributes" or operating conditions that determine what requirements apply

\*\* - Notes changes made to the automated results from the DSS, and a brief explanation why

#### **NSR Versus Title V FOP**

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit (FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

# **New Source Review Requirements**

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room,

located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

The TCEQ has interpreted the emission limits prescribed in 30 TAC §106.4(a) as both emission thresholds and default emission limits. The emission limits in 30 TAC §106.4(a) are all considered applicable to each facility as a threshold matter to ensure that the owner/operator qualifies for the PBR authorization. Those same emission limits are also the default emission limits if the specific PBR does not further limit emissions or there is no lower, certified emission limit claimed by the owner/operator.

This interpretation is consistent with how TCEQ has historically determined compliance with the emission limits prior to the addition of the "as applicable" language. The "as applicable" language was added in 2014 as part of changes to the sentence structure in a rulemaking that made other changes to address greenhouse gases and was not intended as a substantive rule change. This interpretation also provides for effective and practical enforcement of 30 TAC §106.4(a), since for the TCEQ to effectively enforce the emission limits in 30 TAC §106.4(a) as emission thresholds, all emission limits must apply. As provided by 30 TAC §106.4(a)(2) and (3), an owner/operator shall not claim a PBR authorization if the facility is subject to major New Source Review. The practical and legal effect of the language in 30 TAC § 106.4 is that if a facility does not emit a pollutant, then the potential to emit for that particular pollutant is zero, and thus, the facility is not authorized to emit the pollutant pursuant to the PBR.

The status of air permits, applications, and PBR registrations may be found by performing the appropriate search of the databases located at the following website:

www.tceq.texas.gov/permitting/air/nav/air\_status\_permits.html

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

# **New Source Review Authorization References**

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.				
Authorization No.: 18897	Issuance Date: 05/24/2018			
Authorization No.: 93546 Issuance Date: 05/24/2018				
Permits By Rule (30 TAC Chapter 106) for the	e Application Area			
Number: 106.261	Version No./Date: 09/04/2000			
Number: 106.472 Version No./Date: 09/04/2000				
Number: 106.478	Version No./Date: 09/04/2000			

#### **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate

Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

# **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

## Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

## **Compliance Assurance Monitoring (CAM):**

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

- 1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
- 2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
- 3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information					
ID No.: LRACK1					
Control Device ID No.: CA-SK	Control Device Type: Carbon Adsorption System (Regenerative)				
Applicable Regulatory Requirement					
Name: 30 TAC Chapter 115, Loading and Unloading of VOC	SOP Index No.: R115-M6				
Pollutant: VOC	Main Standard: § 115.212(a)(1)				
Monitoring Information					
ndicator: VOC concentration					

Minimum Frequency: Continuous

Averaging Period: 15 minutes

Deviation Limit: VOC concentration greater than the VRU (EPN CA-SK) emission rate of 10 mg/l shall be considered and reported as a deviation.

Basis of CAM: It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.

## **Periodic Monitoring:**

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information			
ID No.: T-4064			
Control Device ID No.: CARB5	Control Device Type: Carbon Adsorption System (Non-Regenerative)		
Applicable Regulatory Requirement			
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R115-T1b6		
Pollutant: VOC	Main Standard: § 115.112(a)(1)		
Monitoring Information			
Indicator: Benzene concentration			
Minimum Frequency: Weekly			
Averaging Period: N/A			
Deviation Limit: Maximum benzene concentration of greater than 5 ppmv measured at the outlet of the second or final polishing canister shall be considered and reported as a deviation.			

#### Basis of monitoring:

A common way to monitor a non-regenerative carbon adsorption system is by measuring the time intervals of the carbon canister replacement. The replacement interval may be determined by performance test, manufacturer's recommendations, engineering calculations, and/or historical data. Monitoring the carbon replace replacement interval of a carbon adsorption system is commonly required in federal and state rules, including: 40 CFR60, Subpart QQQ, 40 CFR 61 Subpart FF; 40 CFR 63 Subparts EE, FF, and MMM; and 30 TAC Chapter 115.

Unit/Group/Process Information			
ID No.: T-4064			
Control Device ID No.: CARB5	Control Device Type: Carbon Adsorption System (Non-Regenerative)		
Applicable Regulatory Requirement			
Name: 40 CFR Part 61, Subpart FF	SOP Index No.: 61FF-T1		
Pollutant: Benzene	Main Standard: § 61.343(a)(1)		
Monitoring Information			
Indicator: Benzene concentration			

Minimum Frequency: Weekly

Averaging Period: N/A

Deviation Limit: Maximum Benzene Concentration of greater than 5 ppmv measured at the outlet of the second or final polishing canister shall be considered and reported as a deviation.

#### Basis of monitoring:

A common way to monitor a non-regenerative carbon adsorption system is by measuring the time intervals of the carbon canister replacement. The replacement interval may be determined by performance test, manufacturer's recommendations, engineering calculations, and/or historical data. Monitoring the carbon replace replacement interval of a carbon adsorption system is commonly required in federal and state rules, including: 40 CFR60, Subpart QQQ, 40 CFR 61 Subpart FF; 40 CFR 63 Subparts EE, FF, and MMM; and 30 TAC Chapter 115.

# **Obtaining Permit Documents**

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (<a href="https://www.tceq.texas.gov/goto/cfr-online">https://www.tceq.texas.gov/goto/cfr-online</a>). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at <a href="https://www.tceq.texas.gov/permitting/air/nav/air status permits.html">https://www.tceq.texas.gov/permitting/air/nav/air status permits.html</a>

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

https://www.tceq.texas.gov/permitting/air/permitbyrule/air\_pbr\_index.html

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical rules/old106list/index106.html

Historical Standard Exemption lists may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical\_rules/oldselist/se\_index.html

Additional information concerning PBRs is available on the TCEQ website:

https://www.tceg.texas.gov/permitting/air/nav/air pbr.html

# **Compliance Review**

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on February 15, 2019.	
Site rating: 31.07 / Satisfactory Company rating: 31.07 / Satisfactory	
(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)	
2. Has the permit changed on the basis of the compliance history or site/company rating?	.No

## Site/Permit Area Compliance Status Review

1	. Were there any out-of-compliance units listed on Form OP-ACPS?	No
	. Is a compliance plan and schedule included in the permit?	

### **Available Unit Attribute Forms**

- OP-UA2 Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 Storage Tank/Vessel Attributes
- OP-UA4 Loading/Unloading Operations Attributes
- OP-UA5 Process Heater/Furnace Attributes
- OP-UA6 Boiler/Steam Generator/Steam Generating Unit Attributes
- OP-UA7 Flare Attributes
- OP-UA8 Coal Preparation Plant Attributes
- OP-UA9 Nonmetallic Mineral Process Plant Attributes
- OP-UA10 Gas Sweetening/Sulfur Recovery Unit Attributes
- **OP-UA11 Stationary Turbine Attributes**
- OP-UA12 Fugitive Emission Unit Attributes
- OP-UA13 Industrial Process Cooling Tower Attributes
- OP-UA14 Water Separator Attributes
- OP-UA15 Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
- OP-UA16 Solvent Degreasing Machine Attributes
- OP-UA17 Distillation Unit Attributes
- OP-UA18 Surface Coating Operations Attributes

- OP-UA19 Wastewater Unit Attributes
- OP-UA20 Asphalt Operations Attributes
- OP-UA21 Grain Elevator Attributes
- OP-UA22 Printing Attributes
- OP-UA24 Wool Fiberglass Insulation Manufacturing Plant Attributes
- OP-UA25 Synthetic Fiber Production Attributes
- OP-UA26 Electroplating and Anodizing Unit Attributes
- OP-UA27 Nitric Acid Manufacturing Attributes
- OP-UA28 Polymer Manufacturing Attributes
- OP-UA29 Glass Manufacturing Unit Attributes
- OP-UA30 Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
- OP-UA31 Lead Smelting Attributes
- OP-UA32 Copper and Zinc Smelting/Brass and Bronze Production Attributes
- OP-UA33 Metallic Mineral Processing Plant Attributes
- OP-UA34 Pharmaceutical Manufacturing
- OP-UA35 Incinerator Attributes
- OP-UA36 Steel Plant Unit Attributes
- OP-UA37 Basic Oxygen Process Furnace Unit Attributes
- OP-UA38 Lead-Acid Battery Manufacturing Plant Attributes
- OP-UA39 Sterilization Source Attributes
- OP-UA40 Ferroalloy Production Facility Attributes
- OP-UA41 Dry Cleaning Facility Attributes
- OP-UA42 Phosphate Fertilizer Manufacturing Attributes
- OP-UA43 Sulfuric Acid Production Attributes
- OP-UA44 Municipal Solid Waste Landfill/Waste Disposal Site Attributes
- OP-UA45 Surface Impoundment Attributes
- OP-UA46 Epoxy Resins and Non-Nylon Polyamides Production Attributes
- OP-UA47 Ship Building and Ship Repair Unit Attributes
- OP-UA48 Air Oxidation Unit Process Attributes
- OP-UA49 Vacuum-Producing System Attributes
- OP-UA50 Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
- OP-UA51 Dryer/Kiln/Oven Attributes
- OP-UA52 Closed Vent Systems and Control Devices
- OP-UA53 Beryllium Processing Attributes
- OP-UA54 Mercury Chlor-Alkali Cell Attributes
- OP-UA55 Transfer System Attributes
- OP-UA56 Vinyl Chloride Process Attributes
- OP-UA57 Cleaning/Depainting Operation Attributes
- **OP-UA58 Treatment Process Attributes**
- OP-UA59 Coke By-Product Recovery Plant Attributes
- OP-UA60 Chemical Manufacturing Process Unit Attributes
- OP-UA61 Pulp, Paper, or Paperboard Producing Process Attributes
- OP-UA62 Glycol Dehydration Unit Attributes
- OP-UA63 Vegetable Oil Production Attributes